

Exhibit 3

Alexander K. Calaway

From: Brian R. Hardy
Sent: Monday, January 17, 2022 3:46 PM
To: 'Tadd Bogan'; Alexander K. Calaway
Cc: Jim Weger; Brittany Goodman; Annie McDonald; Cally Hatfield;
rfitzpatrick@hallestill.com; zbrewer@hallestill.com
Subject: RE: [External] Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

I think an extension of time is appropriate. Tadd – we hope you get better soon.

Brian



Brian R. Hardy, Esq.

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bhardy@maclaw.com
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From: Tadd Bogan <tbogan@jonesgotcher.com>
Sent: Monday, January 17, 2022 3:41 PM
To: Alexander K. Calaway <acalaway@maclaw.com>
Cc: Brian R. Hardy <bhardy@maclaw.com>; Jim Weger <jweger@jonesgotcher.com>; Brittany Goodman <bgoodman@jonesgotcher.com>; Annie McDonald <amcdonald@jonesgotcher.com>; Cally Hatfield <chatfield@maclaw.com>; rfitzpatrick@hallestill.com; zbrewer@hallestill.com
Subject: Re: [External] Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

Alex,

I am so sorry. I thought I was recovered and ready to come back tomorrow, but took a big turn for the worse today. Wasn't able to keep anything down today until I finally got some nausea medicine around 4PM. I finally made it almost two hours without getting sick, so I'm hopeful. Unfortunately, I'm going to have to see how I feel tomorrow to know how soon I can get back to work. Do you want to request an extension? I think we probably should.

Tadd

Sent from my iPhone

On Jan 17, 2022, at 2:58 PM, Alexander K. Calaway <acalaway@maclaw.com> wrote:

Tadd,

Discovery closes next week and you have not responded to my emails below. We are trying to schedule the depositions to accommodate you and your clients schedule, but if we do not get a response within the next 24 hours, we will need to just set the depositions and move forward without your input on times/dates.

Thanks,



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From: Alexander K. Calaway

Sent: Tuesday, January 11, 2022 3:33 PM

To: 'Tadd Bogan' <tbogan@jonesgotcher.com>

Cc: Brian R. Hardy <bhardy@maclaw.com>; 'Jim Weger' <jweger@jonesgotcher.com>; 'Brittany Goodman' <bgoodman@jonesgotcher.com>; 'Annie McDonald' <amcdonald@jonesgotcher.com>; Cally Hatfield <chatfield@maclaw.com>; Brian R. Hardy <bhardy@maclaw.com>; 'RFitzpatrick@HallEstill.com' <RFitzpatrick@HallEstill.com>; 'zbrewer@HallEstill.com' <zbrewer@HallEstill.com>

Subject: RE: [External] Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

Tadd, per my email below, please advise:

1. What dates later in the month Mr. Woodrum will be available (we're flexible if he needs time to recover).
2. Whether Mr. Oppenheimer will be appearing for his zoom depo at our local counsel's office, your office, or his own home/office (We're ok with any of the above).



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From: Alexander K. Calaway

Sent: Thursday, December 30, 2021 2:41 PM

To: 'Tadd Bogan' <tbogan@jonesgotcher.com>

Cc: Brian R. Hardy <bhardy@maclaw.com>; Jim Weger <jweger@jonesgotcher.com>; Brittany Goodman <bgoodman@jonesgotcher.com>; Annie McDonald <amcdonald@jonesgotcher.com>; Cally Hatfield <chatfield@maclaw.com>; Brian R. Hardy <bhardy@maclaw.com>; RFitzpatrick@HallEstill.com; 'zbrewer@HallEstill.com' <zbrewer@HallEstill.com>

Subject: RE: [External] Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

Importance: High

Tadd,

These witnesses have first-hand knowledge of Armory's financial condition and the investment by its owners. Money (if any) expended by Armory in developing its alleged trade secrets is highly material. KEA attempted to obtain this information through requests for production of financial documents, but your clients have refused to cooperate with these requests. We set the depositions of Mr. Woodrum and Mr. Oppenheimer when we did because the close of discovery is near, and it was unclear at that point whether Armory would cooperate with our requests for production.

When Armory was asked in its depo about the investment made by Armory's owners (including Reed Oppenheimer), Jud Gudgel stated he didn't know exact numbers and that Mr. Woodrum handled all the financial issues. When pressed on the amount of investment made by owners, Mr. Gudgel vaguely answered that Mr. Oppenheimer provided "funds as needed" and reiterated that he didn't know exact numbers for each owner.

Sorry to hear about Mr. Woodrum having COVID. We intend to conduct both depositions via zoom if that helps? We will be sending a link later today. If Mr. Woodrum is unable to appear remotely, then we are fine with rescheduling his depo for later in the month. In any event, please advise:

1. What dates later in the month Mr. Woodrum will be available (we're flexible if he needs time to recover).
1. Whether Mr. Oppenheimer will be appearing for his zoom depo at our local counsel's office, your office, or his own home/office (We're ok with any of the above).

Thanks,



Alexander K. Calaway, Esq.

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From: Tadd Bogan <tbogan@jonesgotcher.com>

Sent: Thursday, December 30, 2021 8:33 AM

To: Alexander K. Calaway <acalaway@maclaw.com>

Cc: Brian R. Hardy <bhardy@maclaw.com>; Jim Weger <jweger@jonesgotcher.com>; Brittany Goodman <bgoodman@jonesgotcher.com>; Annie McDonald <amcdonald@jonesgotcher.com>

Subject: RE: [External] Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

Alex,

What financial questions was Armory's designee unable to answer? You issued the subpoenas before taking our client's 30(b)(6) depo, and I don't recall him not being able to answer any of the financial questions asked of him. Without being informed of the scope and/or topics of the depositions, Mr. Woodrum and Mr. Oppenheimer would nonetheless not be prepared to testify about such broad categories or issues.

Further, I was informed this morning that Mr. Woodrum has been exposed to COVID and will be in quarantine on Monday and will not be able to attend a deposition.

Please advise how you would like to proceed. We may be willing to rescheduling Mr. Woodrum's deposition by agreement for later this month, but we need to the topics you want him to cover.

Tadd



Tadd J.P. Bogan | Shareholder

JONES, GOTCHER & BOGAN, P.C.

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From: Alexander K. Calaway <acalaway@maclaw.com>
Sent: Tuesday, December 28, 2021 12:48 PM
To: Tadd Bogan <tbogan@jonesgotcher.com>
Cc: Brian R. Hardy <bhardy@maclaw.com>; Jim Weger <jweger@jonesgotcher.com>; Brittany Goodman <bgoodman@jonesgotcher.com>; Annie McDonald <amcdonald@jonesgotcher.com>
Subject: RE: [External] Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

Tadd,

Please see 12 O.S. § 682(c) – the individual counter defendants in this case are liable for the own tortious conduct. The alter ego claims have been sufficiently pled. We inquired about the financial issues in this case in Armory's 30(b)(6) deposition. The designee was unable to answer our financial questions. He stated that Woodrum was the CFO and had this knowledge. He also stated that he was unaware of the total investment (and continued financing) of Oppenheimer. We asked for this information in document production to avoid having to depose Woodrum and Oppenheimer, but Armory objected to producing the documents. We expect that the depositions of both Woodrum and Oppenheimer will be able to fill these gaps in discovery. The depositions will likely be short which is why we set them on the same day.

Thanks,
Alex



Alexander K. Calaway, Esq.

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From: Tadd Bogan <tbogan@jonesgotcher.com>
Sent: Tuesday, December 21, 2021 1:20 PM
To: Alexander K. Calaway <acalaway@maclaw.com>
Cc: Brian R. Hardy <bhardy@maclaw.com>; Jim Weger <jweger@jonesgotcher.com>; Brittany Goodman <bgoodman@jonesgotcher.com>; Annie McDonald <amcdonald@jonesgotcher.com>
Subject: RE: [External] Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

Alex,

Please see 12 O.S. § 682. Your client's alter ego claims are premature under Oklahoma law. Further, the 30(b)(6) notice to Armory included these categories and Armory presented its corporate representative for deposition last week. For these reasons we object to the depositions of Mr. Woodrum and Mr. Oppenheimer.

Tadd



Tadd J.P. Bogan | Shareholder

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From: Alexander K. Calaway <acalaway@maclaw.com>

Sent: Tuesday, December 21, 2021 1:30 PM

To: Tadd Bogan <tbogan@jonesgotcher.com>

Cc: Brian R. Hardy <bhardy@maclaw.com>; Jim Weger <jweger@jonesgotcher.com>; Brittany Goodman <bgoodman@jonesgotcher.com>; Annie McDonald <amcdonald@jonesgotcher.com>

Subject: RE: Depos of Woodrum and Oppenheimer [IWOV-iManage.FID1110691]

Tadd,

Reed Oppenheimer is a majority owner of, and investor in, GWACS Armory; Clayton Woodrum is the CFO. Both have personal knowledge of the alter ego claims made by KE Arms, as well as Armory's alleged financial investment in the GWACS polymer receiver. It appears the notices of intent to serve these subpoenas were served on 11/29/21. Since we did not receive an objection from any party, the subpoenas were already served. Let me know if you have any additional questions.

Regards,



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From: Tadd Bogan <tbogan@jonesgotcher.com>

Sent: Tuesday, December 14, 2021 9:09 AM

To: Alexander K. Calaway <acalaway@maclaw.com>

Cc: Brian R. Hardy <bhardy@maclaw.com>; Jim Weger <jweger@jonesgotcher.com>; Brittany Goodman <bgoodman@jonesgotcher.com>; Annie McDonald <amcdonald@jonesgotcher.com>

Subject: [External] Depos of Woodrum and Oppenheimer

Alex,

I wanted to follow up on your notice stating you intend to issue subpoenas to Clayton Woodrum and Reed Oppenheimer? What is the purpose of those depositions? I believe we have an objection to these depositions/subpoenas, but I wanted to reach out to you first to understand why you want to take the depositions. Please let us know.

Thank you,

Tadd



Tadd J.P. Bogan | Shareholder

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